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THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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May 5, 2010

Apache-Sitgreaves National Forests
Attn: Plan Revision Team
P.O. Box 640
Springerville, AZ 85938

Re: Forest Plan Revision Initial Draft Alternatives

Dear Plan Revision Team:

The Arizona Game and Fish Department (Department) reviewed the initial draft alternatives developed by the Apache-Sitgreaves National Forest (A-S) for the Forest Plan Revision. The Department appreciates the efforts of the A-S to provide the public, as well as the Department with additional opportunities to provide early input, and understands that these alternatives are in an early stage of development, and thus lack much detail. With this in mind, comments provided by the Department at this time are primarily general in nature.

For your consideration the Department offers the following comments:

Draft Alternative Topics

Ecological Restoration – Overall Conditions:

The Comparison of the Draft Alternatives table indicates that each of the three action alternatives include the use of mechanical (thinning) and natural processes (burning) to provide for ecological restoration, ecosystem resiliency, and species diversity and viability. The three action alternatives vary, however, in their emphasis on mechanical thinning versus burning. The Department supports the use of both mechanical thinning and burning, in the form of prescribed fire and wildland fire use as appropriate land management tools, and believes that the A-S should strive to maintain flexibility in its land management planning process to allow for the use of the most appropriate initial treatment method given existing site conditions. Regardless of the initial method of treatment, however, restoration activities should provide for and promote the return of natural fire regimes to the landscape. Where mechanical thinning treatments occur within fire dependant ecosystems, prescribed fire and, as appropriate, wildland fire use should be incorporated.

Ecological Restoration – Forest Conditions:

The three action alternatives would each provide for uneven-aged conditions across the landscape, yet differ on the amount of mechanical treatments versus burning, as well as the forest types in which treatments would primarily occur. The Department supports management that leads toward uneven-aged conditions, and stresses the need to emphasize vegetative structural heterogeneity within treatment boundaries as well as across the landscape. The Department also strongly urges the A-S to provide for the treatment of all forested types. Although the Department recognizes the urgent need to restore Ponderosa pine forests, particularly when considering the potential impacts from uncharacteristic wildfires, the revised Forest Plan should promote the restoration of all forested types. Of particular concern is the loss of aspen stands due to competition from conifer succession occurring as a result of the absence of natural fire regimes across the landscape.

Ecological Restoration – Grassland Conditions:

Although the A-S contains a relatively small percentage of the grassland habitat that occurs within north-eastern Arizona, those grasslands which do occur on the A-S are of critical importance to the long-term survival of grassland wildlife species, particularly pronghorn. Grassland habitat north of the A-S boundary is generally degraded and highly vulnerable to loss and fragmentation from ongoing and future development and transportation infrastructure. It is therefore vital that those grasslands occurring on the A-S provide for the highest quality habitat possible to meet current and future year-round wildlife habitat requirements, that existing habitat fragmentation is addressed and future fragmentation is prevented, and that further habitat loss is minimized to the greatest extent possible.

Although each of the action alternatives advocate some treatment of grassland habitat, the Department would oppose an alternative which restricts treatments to only those areas where there are commercial uses for tree removal. The Department supports the appropriate removal of Forest products for commercial use, but believes that these activities should not limit the ability of the A-S or the Department to conduct needed restoration activities where there are no commercial uses for tree removal.

Ecological Restoration – Woodland Conditions:

The Department supports the proposed active treatment to restore Madrean pine-oak habitat through burning. The Department recommends that this not only include the application of prescribed fire, but also allows for wildland fire use to the maximum extent possible.

Although pinion-juniper (PJ) woodland may be considered only slightly departed from historic conditions, the Department recommends that the A-S include opportunities for restoration treatment of PJ woodland in the revised Forest Plan. These areas typically serve as big game winter range, which is a limited resource increasingly threatened by development and fragmentation north of the A-S boundary. Of particular concern is the

restoration of grass and forb dominated openings, important browse species, and wildlife movement corridors that have become degraded primarily by juniper encroachment.

Ecological Restoration – Riparian and Aquatic Habitat:

In the arid south-west, riparian and aquatic habitats are disproportionately important to wildlife. Many of these areas have been degraded by multiple use activities that have resulted in the loss of riparian woody vegetation, increased siltation, drying of meadows and springs, and a predominance of non-native bluegrass. The Department strongly supports action alternatives that address these concerns. This includes, action alternative components that provide for the active treatments to improve riparian and aquatic conditions and restore wet meadows, as well as those components that address the impacts of roads that conflict with riparian management objectives. Although not included in all of the action alternatives, the Department urges the A-S to incorporate the restoration of uplands as a component to restoring riparian and aquatic habitat where upland conditions have been documented as contributing to degraded riparian and aquatic habitats.

Ecological Restoration – Wildlife Habitat:

As indicated in the Comparison of the Draft Alternatives table, all three action alternatives would provide direction for species diversity and wildlife connectivity. The Department supports the inclusion of effective Forest Plan direction that would provide for a diverse and robust wildlife community across the A-S. The Department welcomes further coordination with the A-S in the development of this direction.

In addition, all three action alternatives include 10 wildlife quiet areas. The Department strongly supports the inclusion of these wildlife quiet areas into the revised Forest Plan, and would like to continue our discussion with the A-S regarding the potential need and benefits of additional wildlife quiet areas. Although the Department has not conducted formal surveys specific to the wildlife quiet areas, based on many years of observation and feedback from field personnel the Department believes that these areas do provide a higher quality habitat for many species of wildlife. In addition, due to reduced disturbance from motor vehicles, there have been notable changes in wildlife behavior within the boundaries of these areas, such as mule deer and elk remaining bedded in the open during the middle of the day, and increased observation rates for bear, turkey, and large bull elk, which has thus provided for a more rewarding outdoor experience for wildlife enthusiasts, both hunters and non-hunters alike. Lastly, our field personnel have noted that those of the public who have used the quiet areas are very supportive of this concept, having specifically visited these areas because of their designation as a wildlife quiet area.

Recreational Demand:

The Department supports the A-S in its efforts to develop a revised Forest Plan that provides for a broad spectrum of recreational opportunities, including a wide array of wildlife recreational opportunities. To meet current and future demand and to minimize conflict between user groups the Department urges the A-S to include recreational shooting areas in this planning effort. In the Master Memorandum of Understanding

between the U.S. Department of Agriculture Forest Service Southwest Region and the Arizona Game and Fish Commission and Department signed February 2010, both parties agreed that development of formal shooting facilities is an appropriate use of Forest Service Lands.

The Department recognizes the challenge inherent in balancing motorized and non-motorized recreational opportunities. Finding this balance is not only needed to avoid conflict between user groups, but is essential in providing for the protection of wildlife habitat and minimizing disturbance to wildlife species.

The Department also recognizes the negative impacts on wildlife and wildlife habitat from unregulated cross-country motorized travel, and applauds the efforts of the A-S in working to achieve a balance between resource protection and motorized access. The Department urges the forest to include in this balance an adequate allowance for motorized big game retrieval, similar to those proposed allowances provided for other permitted uses such as livestock grazing and firewood collection.

Wilderness/Primitive Area/Inventoried Roadless Areas:

Each of the three action alternatives recommends new wilderness areas and/or additions to existing wilderness areas. The Department recognizes the long-term value to wildlife and the public that such designations can provide. Impacts to wildlife from the continued and irreversible loss of habitat resulting from development and transportation infrastructure is a major concern to the Department, and is the leading challenge facing the Department in maintaining Arizona's wildlife heritage and wildlife recreational opportunities into the future. Designated wilderness areas can and do play an important role in assuring the long-term protection of wildlife habitat from the threat of development.

Also of concern, however, is the continued ability of the Department to adequately manage Arizona's wildlife. As habitat becomes more restricted and fragmented the Department will need to provide a more proactive approach to wildlife management in an effort to maintain and improve declining populations of game and nongame species. A hands-off approach to maintenance of biological diversity is no longer a feasible option, especially in Arizona, where human related impacts have resulted in generally small population sizes. Although wilderness designation offers much value, the Department has experienced restrictions resulting from such special land designations, including project delays and increased costs, and is concerned that if not properly implemented additional wilderness designations could further inhibit the Department's ability to perform necessary management activities.

The Department therefore requests that the A-S coordinate closely with the Department concerning wilderness designations to ensure that full consideration is given to the potential impacts on the ability of the Department to continue to manage fish and wildlife resources and thus maintain and enhance Arizona's wildlife heritage and wildlife recreational opportunities into the future. Specific management actions which may be necessary, and may necessitate the use of motorized equipment include, but are not

restricted to: periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, chemical stream renovations, fish stocking, low-level aerial wildlife survey, research, and law enforcement flights, wildlife capture, construction of temporary release pens, construction and maintenance of wildlife waters, providing salt and mineral supplements, depredation and wildlife mortality investigations, conducting habitat restoration activities such as application of prescribed fire, and law enforcement and public safety activities. Absent these provisions the Department would not be able to support any wilderness designation.

Site Specific Comments

Bear Wallow Wilderness addition: The Department opposes any change that would result in the closing of Forest Road 54 to motorized vehicle traffic. This road currently provides recreationalists an important link to readily access the rim area, the southern portion of Bear Wallow, and areas to the south. Closing FR 54 would severely and unnecessarily restrict motorized access to these areas.

Chevelon Canyon Lake: The Department opposes the inclusion of Chevelon Canyon Lake into a wilderness area. Inclusion of this lake would restrict current public use, which includes motorized boat recreation. Gas motors currently allow anglers to access all portions of the lake and allow the Department to apply motorboat fuel funding to the management of the lake, including maintenance of the dam. Through a Special Use Permit for the Chevelon Canyon dam, the Department is obligated to maintain the dam in a safe operating condition. This may not be possible without the use of motorboat fuel funding. Including the lake in a wilderness area may also impact fish stocking activities. The lake itself defies a core value of wilderness by being totally influenced by man. The lake is maintained entirely by the presence of Chevelon Canyon dam, a man-made structure. Without this dam and the influence of man, the lake would not exist.

Eligible Wild and Scenic Rivers:

The Comparison of the Draft Alternatives table indicates that each of the three initial draft alternatives would provide direction for managing the 23 eligible wild and scenic rivers to maintain their Outstandingly Remarkable Values (ORVs). The Department recognizes the ORVs associated with these areas, including fish, wildlife, and recreation, and supports the continued management of these areas to retain those values. The Department requests that the A-S coordinate closely with the Department during the course of the development of the management direction for these areas to ensure that full consideration is given to the potential impacts on the ability of the Department to continue to manage fish and wildlife resources and thus maintain and enhance those identified values. Specific management actions which may be necessary to maintain and enhance fisheries values include such activities as periodic fish surveys and non-native fish removal utilizing nets or battery and gas powered electrofishing equipment, construction or maintenance of fish barriers, and chemical renovations. These areas also possess outstandingly remarkable wildlife related recreation values. The Department believes that hunting, fishing, and watchable wildlife opportunities are key components

of these values, and that future management of these areas should allow for the continued use of these areas by the public for wildlife related recreational activities.

Threat to Communities from Wildfire:

The Department acknowledges the role of the A-S in reducing the threat of uncharacteristic wildfire to adjacent forest communities, as well as the need to protect A-S lands from fires originating within these communities. The Department supports the implementation of more aggressive fuel reduction treatments within the ½ mile Community Forest Intermix when such treatments provide for additional treatment prescription flexibility and increased structural heterogeneity beyond the Community Forest Intermix. Treatments within the Community Forest Intermix do not, however, minimize the need for ecological restoration treatments beyond the ½ mile zone.

Contribution to Local Communities:

The Department supports the concept of multiple use, and agrees that forest products, including saw logs should be made available as byproducts of restoration treatments. Caution should be taken, however, to ensure that ecological restoration objectives direct all treatment prescriptions and thus available forest products.

Livestock Grazing/Rangeland Resources:

In addition to balancing capacity with available forage, the Department urges the A-S to fully consider and provide for year-round wildlife habitat requirements when developing direction for livestock grazing. The Department is concerned that the recent trend in range management planning to predominantly rely on end of season utilization monitoring in conjunction with long-term monitoring conducted once or twice over the life of a permit could fail to detect certain negative impacts of livestock grazing on wildlife resources. The Department recommends inclusion of early-season monitoring to determine whether there is sufficient forage available to support both livestock and wildlife during the early growing season, when forage is generally limited and its availability may be concentrating both livestock and wildlife feeding activities within the more vulnerable wet meadow habitats. The early growing season is also when demand for higher quality forage for late-term fetus development and lactating wildlife including deer, elk and pronghorn is at its peak. There is also concern that over reliance on end of season utilization is insufficient to assure retention of adequate cover to meet the needs of a variety of wildlife species, including prey species for Mexican spotted owls and pronghorn fawning cover, as well as for insect production for turkey. Early and mid season monitoring would allow the A-S to document whether sufficient herbaceous structure is present to provide for adequate wildlife cover, and more importantly to take appropriate management actions to assure that wildlife cover requirements, if present, continue to be met.

In addition, with a shift in emphasis toward ecological restoration and the use of naturally-ignited fire, it is important that rangeland resources provide for adequate fine fuels to effectively carry fire to achieve ecological restoration and maintenance objectives. Absent sufficient fine fuels on the landscape, the A-S will not achieve long-term ecological

restoration objectives, and will continue a management approach that promotes future departures from natural fire regimes and increased restoration costs.

Management Indicator Species:

The Comparison of the Draft Alternatives table states that each of the draft action alternatives will identify management indicator species (MIS) that will indicate the effects of management activities. The Department requests further coordination with the A-S in developing the list of MIS to be used in the revised Forest Plan.

Land Ownership Adjustments:

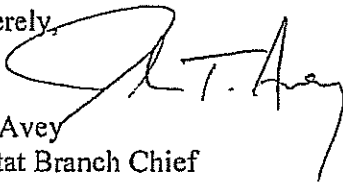
Land ownership adjustments in the form of land exchanges can provide an effective tool in the protection of important wildlife habitat, public access and wildlife recreational opportunity from the threat of development. In developing criteria for land ownership adjustments, priority should be given to land exchanges that provide for the protection of important wildlife habitats, provide for maintenance or improvement of wildlife recreational opportunities, and decrease private land/wildlife conflicts. Criteria should also consider potential impacts on wildlife connectivity.

New Energy Corridors:

The Comparison of the Draft Alternatives table indicates that each of the draft action alternatives will describe areas that are suitable and not suitable for new energy corridors and new energy developments (e.g., biomass, wind, and solar). Although the Department recognizes the need for new energy developments, the loss of multiple use public lands is of great concern. As Arizona's human population continues to grow throughout the life of the revised Forest Plan, and adjacent lands become increasingly impacted by development it is anticipated that wildlife and the public will become increasingly dependent on public lands, including those administered by the A-S. The Department would once again like to stress the vital role that the lands administered by the A-S currently play in providing wildlife habitat as well as opportunities for wildlife related recreation. Public lands, managed under the principle of multiple use, form the cornerstone of wildlife habitat and are essential for maintaining Arizona's wildlife heritage and wildlife recreational opportunities into the future.

The Department would like to thank the A-S for the opportunity to provide further comment. We look forward to continued cooperation and coordination throughout the forest plan revision process. If you have any questions concerning this letter, please contact me the Pinetop Regional Office at (928) 367-4281.

Sincerely,



Josh Avey
Habitat Branch Chief

cc: Jon Cooley, Pinetop Regional Supervisor
Laura Canaca, Projects Evaluation Program Supervisor